

**IN THE UNITED STATES BANKRUPTCY COURT  
OF THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE:** : **CHAPTER 13**  
**STEVEN E. ST. CLAIR** : **CASE NO.: 1:15-bk-02548-HWV**  
:

**MOTION BY DEBTOR/ MOVANT TO CONVERT  
FROM CHAPTER 13 CASE TO CHAPTER 7 CASE**

**AND NOW COME**, Steven E. St. Clair, Debtor/Movant, by and through his attorneys, Jacobson & Julius, and aver the following:

1. This bankruptcy case was commenced by a petition filed by Debtor/Movant under Chapter 13 of the United States Bankruptcy Code on June 15, 2015.
2. Debtor/Movant's filing is due to an increase in child support by \$200.00 per month plus Debtor/Movant has moved out of the marital property.
3. Debtor/Movant was otherwise eligible to proceed under Chapter 13 of said title, and now desires to convert his case to a case under Chapter 7.
4. Debtor/Movant hereby files this conversion pursuant to 11 U.S.C. § 1307(a) to convert his Chapter 13 case to a case under Chapter 7.
5. All schedules and statements as well as the matrix filed in the original Chapter 13 case are still true and correct. If needed, certain schedules including income and expenses schedules will be amended and will be filed with this honorable court within ten (10) days. Debtor will be filing an amended Schedule I and J.

**WHEREFORE**, Debtor/Movant requests relief in accordance with Chapter 7 of the Bankruptcy Code.

Dated: February 2, 2018

s/Chad J. Julius  
Chad J. Julius  
ID # 209496  
Attorney for Debtor/Movant

I, Steven E. St. Clair, Debtor/Movant in the foregoing conversion, certify under penalty of perjury that the foregoing is true and correct.

s/Steven E. St. Clair

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  :  
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**CERTIFICATE OF SERVICE**

I, Tiffany Ramsey, paralegal with the Jacobson & Julius hereby certify that I have served a copy of the foregoing *Motion to Convert Case to Chapter 7* on the following person(s) by CM/ECF or by depositing a true and correct copy in the United States Mail, Postage Prepaid addressed to:

CHARLES J. DEHART III ESQUIRE  
CHAPTER 13 TRUSTEE  
dehartstaff@pamd13trustee.com; harrisburgect@ramapo.com

U.S. TRUSTEE  
228 WALNUT STREET, SUITE 1190  
HARRISBURG, PA 17101  
ustpregion03.ha.ecf@usdoj.gov

s/Tiffany Ramsey  
Tiffany Ramsey, Paralegal  
Jacobson & Julius  
8150 Derry Street  
Harrisburg, PA 17111  
717.909.5858  
FAX: 717.909.7788

Dated: February 2, 2018

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   :

**ORDER**

Upon consideration of Debtor's Motion to convert his Chapter 13 case to a Chapter 7 case, it is hereby ORDERED that the Motion is granted. The Chapter 13 case is converted to a case under Chapter 7 of the Bankruptcy Code.